

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
CHRIS NEWMAN

07-CV-5622 [DAB]

Plaintiff,  
-against-

**NOTICE OF  
MOTION FOR  
ADMISSION  
PRO HAC VICE**

METRO NORTH COMMUTER RAILROAD, JONES  
LANG LASALLE,

Defendants.  
-----X

**PLEASE TAKE NOTICE,** that upon the annexed attorney affirmation of Michael H. Zhu, affidavit of Paul John Riley, Esq, in support of this Motion and the Certificate of Good Standing annexed thereto, that on \_\_\_\_\_, 2008 the undersigned will move this Court before the Honorable Deborah A. Batts, at the United States Courthouse for the Southern District of New York, pursuant to Rule 1.13(c) of the Local Rules of the United States District Courts for the Southern and Eastern District of New York for an Order allowing the admission of movant, Paul John Riley, Esquire a member in good standing of the Bar of Pennsylvania, an attorney pro hac to argue or try this case in whole or in part as counsel. There are no pending disciplinary proceedings against either Mr. Riley or your affirmant in any State or Federal Court.

Dated: New York, New York  
January 21, 2008

FILED  
U.S. DISTRICT COURT  
S.D. OF N.Y.  
2008 JAN 31 PM 1:44

640137 #25 1-31-08 M2

Michael H. Zhu, Esq., P.C.

BY: 

Michael Zhu, Esquire  
Attorneys for Plaintiff  
Chris Newman  
14 Wall Street, 22<sup>nd</sup> Floor  
New York, New York 10005  
(212) 227-2245

TO: Ioana Wenchell, Esq.  
Metro-North Commuter Railroad and  
Jones Lang LaSalle,  
347 Madison Avenue  
New York, New York 10017

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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CHRIS NEWMAN

Plaintiff,

-against-

METRO NORTH COMMUTER RAILROAD, JONES  
LANG LASALLE,

Defendants.  
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07-CV-5622 [DAB]

**AFFIRMATION IN  
SUPPORT OF  
MOTION FOR  
ADMISSION  
PRO HAC VICE**

Michael H. Zhu, an attorney duly admitted to practice before the United States District Court in the Southern District of New York, respectfully affirms under the penalties of perjury, as follows:

1. I am local counsel to the firm of Barish Rosenthal, attorneys of record for Plaintiff. As such, I am familiar with the pleadings and proceedings in this action.

2. I submit this Affirmation in support of the instant motion for an order pursuant to Local Rule 1.13(c) for the admission *pro hac vice* of Paul John Riley, Esquire to participate in the discovery, trial or argument of this particular action, together with such other and further relief as this Court may deem just and proper.

3. I have known the Barish Rosenthal firm and the candidate Paul J. Riley for more than one year professionally, and can attest to his good character and moral standing and, as

such, hereby move for Mr. Riley's admission to the bar of this court for the purpose of co-representing the Plaintiff in this matter<sup>1</sup>.

4. Paul John Riley, Esquire has sworn that he is familiar with and will comply with the standards of professional conduct imposed upon members of the New York Bar, including the rules of court governing the conduct of attorneys and the Disciplinary Rules of the Code of Professional Responsibility.

5. Mr. Riley has been a member of the bar of the Commonwealth of Pennsylvania since November 21, 1988.

6. Mr. Riley has never been subject to disciplinary proceeding in any jurisdiction and is a member in good standing in the aforesaid Court as reflected in the attached Certificate of Good Standing issued by the Supreme Court of Pennsylvania, marked as Exhibit "A" to Mr. Riley's accompanying Affidavit.

Dated: New York, New York  
January 21, 2008

Michael H. Zhu, Esq., P.C.

BY: 

Michael Zhu, Esquire  
Attorneys for Plaintiff  
Chris Newman  
14 Wall Street, 22<sup>nd</sup> Floor  
New York, New York 10005  
(212) 227-2245

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<sup>1</sup> Previously, your affiant moved for the pro hac admission of Rudolph DeGeorge, Esq. Said motion was granted without opposition. However, attorney DeGeorge has recently left the Barish Rosenthal firm, thus necessitating this instant motion.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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**AFFIDAVIT**

METRO NORTH COMMUTER RAILROAD, JONES  
LANG LASALLE

Defendants.  
-----X

Paul John Riley, Esquire, being duly sworn, hereby deposes  
and says as follows:

1. I am an attorney duly licensed to practice law in the  
Commonwealth of Pennsylvania since 1988 and am employed by the  
law firm of Barish Rosenthal, 1717 Arch Street, Philadelphia,  
Pennsylvania, attorneys of record for the plaintiff, Chris  
Newman.

2. I submit this affidavit in support of my motion for  
admission to practice *pro hac vice* in the above-captioned  
matter.

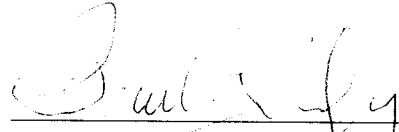
3. As shown in the Certificate of Good Standing annexed  
hereto, I am a member in good standing of the bar of the Supreme  
Court of Pennsylvania.

4. There are no pending disciplinary proceedings against  
me in any State or Federal Court.

5. Annexed hereto as Exhibit "A" is a Certificate of Good

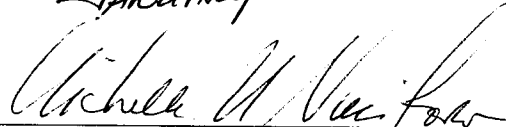
Standing from the Supreme Court of Pennsylvania.

6. Wherefore your Affiant respectfully submits that I should be permitted to appear as Counsel and advocate pro hac vice in this case.

  
Paul John Riley, Esq.

Dated: Philadelphia, PA  
January 21, 2008

Sworn to and before me this 21<sup>st</sup>  
day of JANUARY, 2008.

  
Notary Public

COMMONWEALTH OF PENNSYLVANIA

NOTARIAL SEAL  
MICHELLE M. NUCIFORO, Notary Public  
City of Philadelphia, Phila. County  
My Commission Expires February 16, 2010



Supreme Court of Pennsylvania

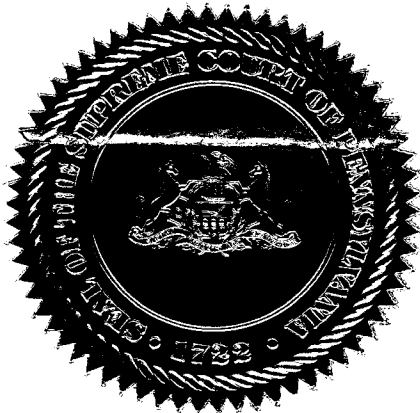
**CERTIFICATE OF GOOD STANDING**

***Paul John Riley, Esq.***

**DATE OF ADMISSION**

***November 21, 1988***

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



**Witness my hand and official seal**

**Dated: January 28, 2008**

A handwritten signature in cursive script, reading "Patricia A. Johnson".

Patricia A. Johnson  
Chief Clerk

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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CHRIS NEWMAN

07-CV-5622 [DAB]

Plaintiff,  
-against-

**ORDER FOR  
ADMISSION  
PRO HAC VICE**

METRO NORTH COMMUTER RAILROAD,  
JONES LANG LaSALLE

Defendants.  
-----X

**AND NOW**, this \_\_\_\_ day of January, 2008 upon consideration of Mr. Paul John Riley, Esq, Motion for Admission Pro Hac Vice, pursuant to Local Rule 1.13(c), and any response thereto, said Motion is **GRANTED**.

BY THE COURT:

\_\_\_\_\_  
U.S.D.J.

**AFFIRMATION OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing NOTICE OF MOTION FOR ADMISSION PRO HAC VICE, ATTORNEY'S AFFIRMATION AND AFFIDAVIT to defendants was served by first-class mail, postage prepaid, upon:

Ioana Wenchell, Esq.  
Metro-North Commuter Railroad  
And Jones Lang LaSalle  
347 Madison Avenue  
New York, New York 10017

on this <sup>31<sup>st</sup></sup>~~23<sup>rd</sup>~~ day of January, 2008.

Michael H. Zhu, Esq. PC  
Attorneys for  
Plaintiff Chris Newman

By: \_\_\_\_\_

  
Michael H. Zhu

14 Wall Street - 22nd Floor  
New York, New York 10005-1198  
(212) 227-2245

Docket No. 06-CV-5622 DAB

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CHRIS NEWMAN,

Plaintiff,

-against-

METRO NORTH COMMUTER RAILROAD and JONES LANG LaSALLE

Defendants.

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**NOTICE OF MOTION FOR PRO HAC ADMISSION**

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MICHAEL H. ZHU, ESQ.

*Attorneys for Plaintiff Chris Newman*

*Office and Post Office Address, Telephone*

14 WALL STREET, 22<sup>ND</sup> FLOOR  
NEW YORK, N.Y. 10005  
(212) 227-2245

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To

Signature (Rule 130-1.1-a)

.....  
Print name beneath

Attorney(s) for

---

Service of a copy of the within

is hereby admitted.

Dated,

.....  
Attorney(s) for

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Please take notice

NOTICE OF ENTRY

that the within is a (*certified*) true copy of a  
duly entered in the office of the clerk of the within named court on

NOTICE OF SETTLEMENT

that an order  
settlement to the HON.  
of the within named court, at  
on

at

of which the within is a true copy will be presented for  
one of the judges

M

Dated,

Yours, etc.

MICHAEL H. ZHU, ESQ.

*Attorneys for plaintiff Chris Newman*

*Office and Post Office Address*

14 WALL STREET, 22<sup>ND</sup> FLOOR

NEW YORK, N.Y. 10005

To

Attorney(s) for